



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking on the)
Commission's own motion into the programs,)
practices and policies related to implementation)
of the California Environmental Quality Act as it)
applies to jurisdictional telecommunications)
utilities.)

Rulemaking 00-02-003
(Filed February 3, 2000)

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 6069-C) ON THE
DRAFT DECISION OF COMMISSIONER BROWN

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
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Order Instituting Rulemaking on the)	
Commission’s own motion into the programs,)	Rulemaking 00-02003
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**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 6096-C) ON THE
DRAFT DECISION OF COMMISSIONER BROWN**

I.

INTRODUCTION

It is the policy of the State of California, as expressed in Public Utilities Code Section 767.7(a) (1), to “encourage the rapid and economic development of telecommunications services to all Californians.” California’s legislature stated this policy in the specific context of fostering the deployment of new landlines for telecommunications. Despite the growth of cellular communications and the potential of VOIP, wireline communication remains the mainstay of communication in California - - routinely relied upon by Californians regardless of geography or socioeconomic status.

If the Commission adopts Commissioner Brown’s Draft Decision (the “DD”), it runs the substantial risk that it is taking a giant step backwards in terms of the “rapid and economic development of telecommunications services to all Californians.” And it will have done so on the basis of speculation and conjecture instead of a reliable factual record. It will also have done so without any assessment of economic effects or consequences, as required by Public Utilities

Code Section 321.1. SCE urges the Commission to reject the “about-face” which the DD represents and to further consider the alternative proposals for CEQA compliance advanced by parties to this proceeding.

II.

THERE IS NO RECORD TO SUPPORT THE DD’S KEY ASSUMPTION THAT ETP REVIEWS CAN BE COMPLETED IN A TIMELY WAY. LOGIC SUGGESTS THE CONTRARY IS TRUE.

The DD concedes that the original Expedited Treatment Process (the “ETP”) as detailed in the April 26 Assigned Commissioner’s Ruling was “over-inclusive,” and that over-inclusiveness was a source of potential delay.¹ However, the DD asserts that by creating a few exceptions for repair and replacement activities, the ETP can “ensure” that “California’s telecommunications infrastructure is built... in a timely manner...”² The incomplete factual record in this proceeding does not support this key assertion. To the contrary, logic and the very limited factual record raise serious doubts that Commission staff can review and approve the current volume of construction projects in anything approaching “a timely manner.” A more likely scenario is that the review-and-approval process will come to a virtual standstill as Commission staff struggle with the large number of applications, the breadth and complexity of the information presented, and questions about how to apply vague and confusing exemptions to the rules. Such a result is simply not consistent with the mandate to “encourage the rapid and economic development” of telecommunications infrastructure.

Consider the facts presented *by just two* of the carriers in this proceeding. AT&T has stated that for 2005 alone, the ETP as it was originally proposed in the April 26 Assigned Commissioner’s Ruling would have “applied to almost 50,000 individual construction projects undertaken by AT&T throughout the State,” as well as an additional “28,000 maintenance digs...

¹ DD, p. 10.

² *Id.*

to repair service.”³ Likewise, Verizon reported that, “[f]or Verizon alone, *thousands* of new construction projects that do not require CEQA review by the Commission would potentially have to be submitted under the ETP *per month*.”⁴

Consider also the detailed process Commission staff must follow to complete the review-and-approved process “in a timely manner.” Before filing under the ETP, a carrier must assemble a large amount of data to meet the carrier’s burden of providing “documentation and factual evidence sufficient to support a finding” that the construction activity is CEQA-exempt.⁵ This “rigorous self-assessment”⁶ includes the results of research on the cultural historical, paleontologic and biological resources in the project setting, project, an analysis of current land use, and a detailed construction work plan.⁷ The DD adds the further requirement that the carrier must identify “all expansions to its network undertaken in the same geographic region within the past two years, where geographic region is defined as the county in which the proposed construction will occur and any adjacent counties.”⁸ This one new requirement may double or triple (at least) the size of each application because carriers may have to report hundreds of projects constituting “network expansions” in the same county and all adjacent counties.

The Energy Division staff will have to sift through this mountain of information to confirm that the project is CEQA-exempt. Staff must complete an “early bad news” review within seven days of receiving the carrier’s filing.⁹ This initial review must determine whether the applicant has completed all of the checklists, work plans, and other details of the ETP review and determine whether there are “obvious reasons why the proposal is not appropriate” for ETP.¹⁰

³ *Comments of AT&T California (U 1001 C), On Assigned Commissioner’s Ruling Requesting Comments Dated April 26, 2006*, dated May 12, 2006, p. 10.

⁴ *Comments of Verizon California Inc. (U 1002 C) In response to Assigned Commissioner’s Ruling Requesting Comments*, dated May 12, 2006, p. 1. (Italics in the original.)

⁵ *Assigned Commissioner’s Ruling Requesting Comments*, (“Ruling”), dated April 26, 2006, p. 9.

⁶ *Id.*, p. 7.

⁷ *Id.*, pp. 8-9.

⁸ *DD*, p. 9.

⁹ *Ruling*, p. 9.

¹⁰ *Id.*

Staff must then arrange for the proposal to be posted to the Commission’s website and review all protests that are received from municipalities, property owners, environmental groups or other third parties.¹¹ The Energy Division is to complete its review and approve or deny the project within twenty-one days of the date when the applicant submits all required information about the project.¹² No one can seriously question that the review of each ETP application will be extremely labor-intensive for the Energy Division.

In the face of the substantial new burden placed on carriers and Energy Division staff, the DD presents no factual basis for its assurances that the ETP will allow the installation of new infrastructure to proceed in a “timely manner.” In fact, there is absolutely no basis for this wishful assertion in the record at this time. No one knows what percentage of the thousands of construction projects undertaken by Verizon and AT&T each month are covered by the DD’s new repair and maintenance exceptions and what percentage of projects must still be subject to ETP review.¹³ No one knows how many projects undertaken by the hundreds of other carriers doing business in California will be subject to ETP review. No one knows how many ETP applications Energy Division staff can reasonably be expected to process in a day, a month or a year. In fact, the record does not even indicate how many Energy Division staff will be re-assigned from other Commission projects to the ETP project.

Until the factual record is complete, SCE urges the Commission not to consider adopting the ETP. To do so would be inconsistent with the legislative mandate to encourage the “rapid and economic development of telecommunications services to all Californians.”

¹¹ *Id.*, pp. 9-10.

¹² *Id.*

¹³ To further complicate this analysis, the DD creates an exemption for the installation, repair and maintenance of equipment on or in existing structures only if the activity “results in no significant visual impact and is not adjacent to a particularly sensitive environment.” (*DD*, p. 12.) The DD itself points out the vagueness of these requirements. *Id.* Thus, in an abundance of caution, carriers may submit ETP applications for projects that they believe to be exempt rather than face the possibility of sanctions.

III.

THE ECONOMIC IMPACTS OF IMPLEMENTING ETP SHOULD NOT BE IGNORED.

Public Utilities' Code Section 321.1 directs the Commission to "assess the economic effects or consequences of its decisions as part of each ratemaking, rulemaking, or other proceeding." In this rulemaking, no attempt has been made to gauge the cumulative economic impacts of implementing ETP. Yet, it is clear that adding this new and burdensome layer of review for CEQA-exempt projects will be costly for the carriers that must comply with it, and for the Commission, which must provide all of the resources to administer it. Ultimately, some or all of the costs will be passed on to California consumers. Section 321.1 mandates that the Commission should assess these costs as part of this rulemaking. The DD's failure to do so is legal error, and by itself sufficient reason to reject the DD.

IV.

CONCLUSION

SCE requests that the Commission reject Commissioner Brown's DD and give further consideration to the alternative proposals made by the parties in this proceeding.

Respectfully submitted,

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July 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 6069-C) ON THE DRAFT DECISION OF COMMISSIONER BROWN on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **10th day of July, 2006**, at Rosemead, California.

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